

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Piper Sandler & Co.,

Case No. 0:23-CV-2281

Plaintiff,

v.

Constanza Gonzalez,

Defendant.

**PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

---

TO: Defendant Constanza "Connie" Gonzalez, 1319 N 200 W, Orem, Utah 84057.

Plaintiff, by and through its attorneys, move the court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a temporary restraining order and preliminary injunction as follows:

1. Enjoining Defendant Gonzalez, for 90 days from the date of the Court's Order, from soliciting any Piper client or potential client with whom Gonzalez had contact within the last 12 months of her employment at Piper;
2. Enjoining Gonzalez from disclosing, using or misappropriating any confidential information of Piper Sandler & Co.; and
3. Enjoining Gonzalez to provide, unaltered, all devices she has used from the start of her employment with Piper on January 3, 2022 to the present so that Piper may have an independent forensic examiner review the devices and, if necessary, scrub the devices of all Piper information.

This motion is based upon the files, records and proceedings herein, the memorandum and declarations submitted herewith and such further evidence or argument as may be required or permitted by the Court. Plaintiffs request expedited handling of their motion pursuant to Local Rule 7.1(d)(4).

**ANTHONY OSTLUND LOUWAGIE  
DRESSEN & BOYLAN P.A.**

Dated: August 2, 2023

By: s/ Joseph W. Anthony

Joseph W. Anthony (#0002872)  
janthony@anthonyostlund.com  
Peter J. McElligott (#397578)  
pmcelligott@anthonyostlund.com  
William R. Paterson (#401045)  
wpaterson@anthonyostlund.com  
90 South 7th Street  
3600 Wells Fargo Center  
Minneapolis, MN 55402  
Telephone: 612-349-6969

**ATTORNEYS FOR PLAINTIFF**